

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SCOTTSDALE INSURANCE COMPANY,

14-cv-07318-KAM-VMS

Plaintiff(s),

-against-

ANSWER

BO STEEL GROUP, INC., KSK CONSTRUCTION
GROUP, SEVENBERRY CONSTRUCTION LLC,
31-02 NORTHERN BLVD LLC, 30-36 NORTHERN
BLVD LLC, and ENFRY ADONIS HIERRO,

Defendants.

Defendant, ENFRY ADONIS HIERRO i/s/h/a ENFRY ADONIS HIERRO, by his attorneys GINARTE O'DWYER GONZALEZ GALLARDO & WINOGRAD, LLP, for his answer to the plaintiff's complaint alleges as follows:

1. Defendant, ENFRY ADONIS HIERRO neither admits nor denies the allegations set forth in the complaint herein as there are no causes of action asserted against this Defendant.


FIRST AFFIRMATIVE DEFENSE:

2. The complaint fails to state a cause of action upon which a claim for relief can be granted.

Dated: New York, New York
February 26, 2015

Yours, etc.,

GINARTE O'DWYER GONZALEZ
GALLARDO & WINOGRAD, LLP.


By: GLENN VERCHICK, ESQ. (GV1766)
Attorneys for Defendant
Enerfry Adonis Hierro
225 Broadway, 13th Fl.
New York, New York 10007
Tel: (212) 601-9700
File No.: 602952

TO: Jonathan Schapp, Esq.
GOLDBERG SEGALLA LLP
Attorneys for Plaintiff
Scottdale Insurance Company
665 Main Street, Suite 400
Buffalo, NY 14203

KING & KING, LLP
Attorneys for Defendants
KSK and Sevenberry
27-12 37th Avenue
Long Island City, NY 11101
(718) 896.6554

AFFIDAVIT OF SERVICE

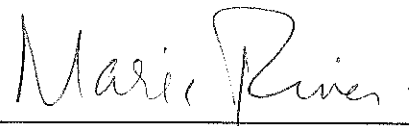
STATE OF NEW YORK : COUNTY OF NEW YORK ss:

MARIA RIVERA, being duly sworn, deposes and says: that deponent is not a party to this action, is over 18 years of age, and resides at New York, New York.

That on February 26, 2015, deponent served the within ANSWER by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in--a post office--official depository under the exclusive care and custody of the United States Postal Service within New York State:

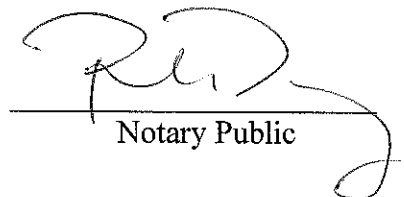
TO: Jonathan Schapp, Esq.
GOLDBERG SEGALLA LLP
Attorneys for Plaintiff
Scottdale Insurance Company
665 Main Street, Suite 400
Buffalo, NY 14203

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Attorneys for Defendants
KSK and Sevenberry
27-12 37th Avenue
Long Island City, NY 11101
(718) 896.6554



MARIA RIVERA

Sworn to before me on
February 26, 2015.


Notary Public

RAQUEL DAVY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01DA6267874
Qualified in Kings County
My Commission Expires August 27, 2016